

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	
Ki Chang Kim and Mira Kim)	Case No. 16-00692
)	Chapter 7
Debtors.)	Judge Carol A. Doyle

NOTICE OF MOTION

To: David M. Siegel

PLEASE TAKE NOTICE that on the January 11, 2018 at 10:30 am or as soon as counsel may be heard, I shall appear before Judge Carol A. Doyle in Courtroom 742 of the United States Bankruptcy Court, 219 South Dearborn, Chicago, Illinois, 60604, and shall then and there present **Motion for Relief from the Automatic Stay**, a copy of which is hereby served upon you.

By: /s/ Ryan Kim
Its Attorney

Ryan Kim
Inseed Law, P.C.
2454 E Dempster St. #301
Des Plaines, IL 60016
(847) 905-6262

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the January 9, 2018, he duly served (or caused to be served) upon the persons on the attached Service list, by First Class U.S. Mail, unless such parties were electronically notified, together with a copy of the Routine Motion and Notice thereto.

/s/ Ryan Kim

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MOTION FOR RELIEF FROM THE AUTOMATIC STAY

NOW COMES Nong Shim America (“Nong Shim”), by and through its attorney, Ryan Kim, pursuant to Section 362 of the United States Bankruptcy Code (the “Code”), 11 U.S.C. §362, brings this Motion for Relief from the Automatic Stay (the “Motion”), and hereby respectfully requests the entry of an Order granting Nong Shim relief from the automatic stay with respect to certain real property of the Debtors having an address of 4600 W. Jarvis Ave, Skokie, IL 60076 (the “Property”). In further support of this Motion, Movant respectfully states:

1. Debtors filed a petition under Chapter 7 of the United States Bankruptcy Code on January 19, 2016. A discharge has not been issued yet, pending the resolution of an adversary proceeding.
2. Nong Shim has a judgment lien against Debtors’ Property commonly known as 4600 W. Jarvis Ave, Skokie, IL 60076.
3. Said Judgment was recorded on September 29, 2011, in the Recorder’s Office of Cook County, Illinois as Document Number 1227650059 (“Judgment”).
4. As of January 9, 2018, the outstanding amount of the Debtors’ obligation under the Judgment is \$36,314.36.

5. This Court entered an Order granting in part and denying in part the Motion to Avoid Lien, on December 6, 2017. The Court held that the home had enough equity that \$26,162.00 of the lien remained.
6. Pursuant to 11 U.S.C. §362(d), cause exists to grant Movant relief from the automatic stay for the following reasons:
 - a. Movant's interest in the Property is not adequately protected as there is a continuing daily increase in the total amount outstanding and chargeable against said Property for interest and costs due under the Judgment.
 - b. Debtors' obligation under the Judgment is in default and Debtors are due in the amount of \$36,314.36 as of January 9, 2018.

WHEREFORE, Movant prays that this court enter an order terminating or modifying the automatic stay and granting the following: Relief from the Stay allowing Movant to proceed under applicable nonbankruptcy law to enforce its remedies to foreclose upon and obtain possession of the property and for such other relief as the court deems proper.

Respectfully submitted,

Dated: January 9, 2018

Nong Shim America, Inc.

/s/ Ryan Kim

Ryan J. Kim

INSEED LAW, P.C.
2454 E Dempster St Suite 301
Des Plaines, IL 60016
Attorney for Plaintiff